

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

**AMY ROLLS, ON BEHALF OF
THE MINOR CHILD ANZLEY ROLLS**

CIVIL ACTION NO. 2:18-CV-00188

JUDGE ROBERT S. SUMMERHAYS

VERSUS

MAGISTRATE JUDGE KATHLEEN KAY

**PACKAGING CORP. OF AMERICA,
INC., ET AL**

**DEFENDANT PACKAGING CORPORATION OF AMERICA'S
MOTION FOR SUMMARY JUDGMENT**

NOW INTO COURT, through undersigned counsel, come Defendant, Packaging Corporation of America ("PCA"), who respectfully requests this Court issue an order: (1) granting its Motion for Summary Judgment as to all of Plaintiffs' claims; (2) dismissing all of Plaintiffs' claims, with prejudice; (3) granting PCA its reasonable costs; and (4) granting PCA all other relief deemed just and proper by the Court.

For the reasons more fully set forth in the attached memorandum and supporting summary judgment evidence included with this motion, Plaintiffs' claims fail. At the time of the explosion in question, the decedent, William Rolls, Jr., was the Statutory Employee of PCA under Louisiana law. As a result, the Plaintiffs' recovery prayed for herein is conclusively barred by operation of the exclusive remedy provisions of the Louisiana Workers' Compensation Act.

Respectfully submitted,

/s/ Jeffrey A. Riggs

BY: _____

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CERTIFICATE OF SERVICE

I certify that on July 24, 2019, I electronically filed *Defendant Packaging Corporation of America's Motion for Summary Judgment* with the Clerk of Court using the CM/ECF system, which will automatically send notice of this filing to all counsel of record.

/s/ Jeffrey A. Riggs

JEFFREY A. RIGGS